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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, Individually and On Behalf of All Others Similarly Situated,	:	1:03-cv-12628 (NG)
Plaintiff,	:	RELATED ACTIONS:
vs.	:	1:04-cv-10046 (NG)
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	1:04-cv-10055 (NG)
Defendants.	:	1:04-cv-10065 (NG)
	:	1:04-cv-10077 (NG)
	:	1:04-cv-10078 (NG)
	:	1:04-cv-10090 (NG)
	:	1:04-cv-10144 (NG)
	:	1:04-cv-10155 (NG)
	:	1:04-cv-10179 (NG)
	:	1:04-cv-10189 (NG)
	:	1:04-cv-10190 (NG)
	:	1:04-cv-10202 (NG)
JOHN G. ESPOSITO, JR., Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10013 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	
JOSEPH L. KING, Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	1:04-cv-10038 (NG)
vs.	:	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,	:	
Defendants.	:	

**MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL**

William E. Homeyer, Jr., William Kim, Gernot Buerger, Thomas Echlin, and Richard M. Acuna (collectively, the "Homeyer Group" or "Movants"), by their counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing the Homeyer Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); and (iii) approving the Homeyer Group's selection of Milberg Weiss Bershad Hynes & Lerach LLP and Rabin, Murray & Frank LLP as Co-Lead Counsel, and Moulton & Gans, P.C. as Liaison Counsel of the actions, pursuant to the PSLRA. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

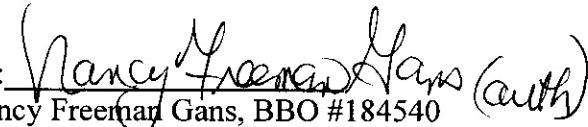
REQUEST FOR ORAL ARGUMENT

Movants respectfully request oral argument on this motion.

DATED: March 1, 2004  
Boston, Massachusetts

Respectfully submitted:

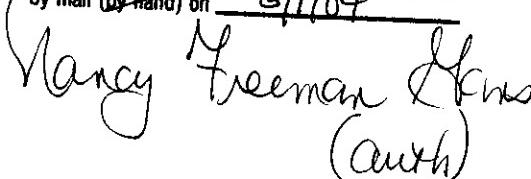
**MOULTON & GANS, P.C.**

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**CERTIFICATE OF SERVICE**  
I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (by hand) on 3/1/04

  
(auth)

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